

Robert S. Wagner, OSB #844115
David C. Lewis, OSB #953348
MILLER & WAGNER LLP
Trial Lawyers
2210 N.W. Flanders Street
Portland, OR 97210-3408
Telephone: (503) 299-6116
Facsimile: (503) 299-6106
E-mail: rsw@miller-wagner.com
dcl@miller-wagner.com

Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CARRIE MEDINA,)	
)	Case No. 3:15-cv-00232-BR
Plaintiff,)	
)	JOINT MOTION TO EXTEND
vs.)	ABATEMENT OF CASE
)	
CITY OF PORTLAND, a municipal)	
corporation, CITY OF GRESHAM, a)	
municipal corporation, TRI-COUNTY)	
METROPOLITAN TRANSPORTATION)	
DISTRICT OF OREGON, a municipal)	
corporation, OFFICER TAYLOR LETSIS,)	
as both an individual and in his official)	
capacity as an officer of the Gresham)	
Police Department, UNKNOWN POLICE)	
OFFICERS NOS. 1, 2 AND 3, both as)	
individuals and in their capacities as)	
officers of the Portland Police Bureau,)	
)	
Defendants.)	

MOTION

The parties respectfully request leave of the court to extend the abatement of this case until August 1, 2016.

On October 21, 2015, the parties participated in mediation before the Honorable Oregon Senior Judge Susan M. Leeson. The parties were unable to reach a final resolution, but did reach a preliminary agreement to undertake certain actions in order

to finally resolve the claims at issue in this lawsuit. If those actions are successfully completed, then this case may be resolved without further involvement of the court.

The parties initially requested an abatement of this lawsuit until May 2, 2016, and an extension of all pretrial and trial deadlines, in order to complete the agreed upon conditions precedent to final resolution of this lawsuit. This Court granted that motion and struck all case-management deadlines. (Docket # 37.)

The parties are still working and conferring on the agreed upon conditions precedent to final resolution of this lawsuit. However, the parties need an additional 91 days, until August 1, 2016, in order to complete those actions and successfully conclude this lawsuit.

MILLER & WAGNER LLP

DATED: 5/09/16

/s/ David C. Lewis
Robert S. Wagner, OSB #844115
David C. Lewis, OSB #953348
Of Attorneys for Defendants

DAVIS WRIGHT TREMAIN LLP

DATED: 5/09/16

/s/ Tim Cunningham
Alan J. Galloway, OSB #083290
Tim Cunningham, OSB #100906
Of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **JOINT MOTION TO EXTEND ABATEMENT OF CASE**, on the following parties at the following addresses by notice of electronic filing using the CM/ECF system:

Charles J. Paternoster
Parsons Farnell & Grein LLP
1030 SW Morrison Street
Portland, Oregon 97205
503-222-1812
cpaternoster@pfglaw.com

Alan J. Galloway
Tim Cunningham
Davis Wright Tremaine LLP
1300 SW Fifth Ave., Suite 2400
Portland, Oregon 97201
503-241-2300
alangalloway@dwt.com
timcunningham@dwt.com
Of Attorneys for Plaintiff

DATED this 9th day of May, 2016.

/s/ David C. Lewis
Robert S. Wagner, OSB #844115
David C. Lewis, OSB #953348
503-299-6116